



The Environmental Action Committee *of* West Marin

April 7, 2005

Superintendent Don Neubacher
Point Reyes National Seashore
Point Reyes Station, CA 94956

RE: Non-Native Deer Management Plan Draft EIS.

Dear Superintendent Neubacher,

The Environmental Action Committee of West Marin supports Preferred Alternative E of the Point Reyes National Seashore Non-Native Deer Management Plan Draft Environmental Impact Statement.

Protecting and restoring biodiversity is a core goal of the Environmental Action Committee of West Marin and of the National Park Service. The pace and intensity of disturbance and degradation by humans of natural habitats, through introduction of invasive species and other means, has greatly increased over the past century. However, there has also been a related—if belated—growth of the realization that we can and must restore some of the damage we have caused. The legislation that established the Point Reyes National Seashore in 1973 reflects that realization. It specifically requires that the Park be managed “to protect and preserve biodiversity and the natural values and natural heritage of the landscape.”

Despite assertions to the contrary, there is ample evidence that exotic deer, which were introduced into this area in the 1940s for the purpose of being hunted, have adverse impacts on soils, water resources, vegetation, and native wildlife, including some threatened and endangered species. Axis and fallow deer primarily eat grasses, but they also feed on other plants and on the buds, shoots, and leaves of a variety of shrubs and trees. Although they occupy the same general niche as the native tule elk and black-tailed deer and are in competition for food and territory with them, the exotic deer differ from the natives in several ways. Though smaller than elk, they are more aggressive and can oust elk from the grasslands where they feed. The exotics also gather in larger herds, engage in destructive behavior in rutting season and make wider trails.

Some other examples of the adverse impacts of exotic deer:

- Fallow deer congregate in riparian areas in herds of up to 150 deer, feeding on and trampling the understory and middle layer of vegetation. The riparian understory and mid-level vegetation is nesting habitat for Swanson’s thrushes, MacGillivray’s and Orange-crowned warblers, yellowthroats and other ground-nesting songbirds. These are all highly-refined species that occupy very narrow niches and have highly specific habitat needs. But their habitats, which naturally have limited ranges, are shrinking due partly to the degradation caused by non-native deer.
- Axis and fallow deer damage the streams that are key to the life of the Seashore and West Marin in general. The limited streambed habitat within the Seashore supports a suite of sensitive species— red-legged frogs, freshwater shrimp, Pacific giant salamanders, aquatic garter snakes, coho and steelhead. All of these depend for their survival on the Seashore’s few remaining intact watercourses. But non-native deer destroy riparian

vegetation by over-grazing, antler rubbing during rutting season, and trampling. They erode the banks and compact the soil by trampling and repeated stream crossings; and they damage water quality by compaction, erosion and defecation. Fences erected to keep cattle out of the riparian zone generally fail to keep out nimble, aggressive, and high-jumping deer.

- Axis and fallow deer compete for food with small mammals, such as Pacific jumping mouse, western harvest mouse, California vole, black-tailed jack rabbit, brush rabbit and the dusky-footed woodrat. Since many of these mammals are important food sources for birds of prey, there is an indirect impact on our native birds of prey, including the endangered Northern spotted owl, great-horned owl, short-eared owl, western screech owl, long-eared owl, barn owl, American kestrel, red-tailed hawk, and black-shouldered kite.
- Currently, there are roughly 1100 non-native deer, all contained within Park boundaries, but without population controls, the deer will spread beyond the Park, with adverse impacts on riparian corridors and native species on private, state park, and water district lands where effective control will be extremely expensive and difficult, if not impossible.

The eradication of non-native deer would enhance the long-term health of the Point Reyes National Seashore by making possible restoration of overgrazed areas and trampled riparian environments, by reducing competition with native tule elk and black-tailed deer and by reducing impacts to other native species. Alternative E calls for complete eradication of axis and fallow deer from the Seashore by 2020 using a combination of contraception and killing by trained sharpshooters.

While we understand the distress this proposal causes many people, it is important to realize that axis and fallow deer themselves imperil many native species. We support Alternative E because it protects biodiversity while causing the fewest number of deaths of non-native deer. Under Alternative E, a total of 1350 exotic deer would be killed by 2020 by which time the herd would be eradicated and the killing cease.. Alternatives B and C, which would keep the combined exotic herd at a population of 700, would entail annual culls in perpetuity, resulting in the deaths of at least 4000 deer by 2065.

At present, with the exotic deer populations at roughly 250 axis deer and 860 fallow deer, the impacts are moderate. But without some form of control, their numbers will increase, and so will the adverse impacts. In order to minimize ecological damage and the costs of reversing it, and to harm the fewest possible animals, it makes sense to get control of the situation now.

The arguments against the Preferred Alternative are not compelling. Control of herd size is not being proposed out of a dislike for exotic species, but in order to protect native species. Protection of native species from invasive exotics is widely supported by the public. Each year Park volunteers help uproot invasive French broom and iceplant, and the Park has a zero-tolerance approach to the invasive wild turkeys released in the 1970s years by the CA Department of Fish & Game and which are spreading at an alarming rate throughout Marin County. The fact that the exotic deer are more appealing than wild turkeys, or have been around for several decades is irrelevant. It cannot be the case that invasive exotics should be eliminated unless they are cute or familiar. In fact, the exotic deer are newcomers even in the context of recent human settlement, not to mention the prehistoric presence of Point Reyes' native species. Indeed, some human residents of Point Reyes still remember with pleasure the days before the deer were introduced.

The suggestion that the Park should keep the deer fenced in, so that tourists can continue to enjoy watching them is also unimpressive. First, deer are extremely difficult to keep in or out of a given area, as many gardeners know to their cost. Second, without a control program, any confined deer population will eventually outgrow its assigned area. Third, the Park's mandate is natural resource protection and restoration: it has neither the authority nor the resources to function as a zoo. Fourth, the relevant State authorities have indicated that, due to the reservoir in the exotic deer herds of Johne's disease (to which cattle, as well as tule elk and black-tailed deer are susceptible), they will not allow any of the deer to be relocated to private land.

Finally, while it is true that the deer, exotic or not, are beautiful and fascinating and many people enjoy watching them as they drive or walk past, a brief visual experience does not convey the full impact that these deer have on the environment. It is to be hoped that the present initiative, and the controversy it has given rise to, will result in a broader and deeper understanding of the impact of invasive exotics on native ecosystems and of the need for protection and restoration of biodiversity in our national parks.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Caufield".

Catherine Caufield
Executive Director

Cc: Congresswoman Lynn Woolsey, Senator Barbara Boxer, Senator Dianne Feinstein